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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 MINNIE F. BERNARDINO, individually; LINDA
 9 GABERTAN NICOLAS, individually; and TESSY
 LAKE, individually,

10 Plaintiffs,

11 vs.

12 NATIONWIDE GENERAL INSURANCE COMPANY, a
 13 foreign corporation; DOE INDIVIDUALS 1-20,
 14 inclusive; and ROE CORPORATIONS 1-20,
 inclusive,

15 Defendants.

CASE No.: 2:25-cv-00806-MMD-BNW

**STIPULATION AND ORDER TO
 EXTEND DISCOVERY (FIRST
 REQUEST)**

17 Plaintiffs Minnie F. Bernardino, Linda Gabertan Nicolas and Tessy Lake, by and through their
 18 attorney of record, Jared G. Christensen, Esq. of Dimopoulos Law and Defendant Nationwide General
 19 Insurance Company, by and through its attorneys of record, Griffith Hayes, Esq. of the law firm Tyson
 20 & Mendez LLP, hereby request this Honorable Court to adopt and approve this stipulated extension
 21 to the discovery plan and continue the discovery deadlines for 60-days as requested herein.

22 **I. LOCAL RULE IA 6-1 IS SATISFIED**

23 This is the first request for extension of discovery deadlines filed by the parties. Pursuant to
 24 the Scheduling Order from May 14, 2025, the following dates govern for purposes of discovery:

- | | |
|-----------------------------------|--------------------|
| 25 1. Discovery Cutoff Date: | September 30, 2025 |
| 26 2. Initial Expert Disclosure: | July 2, 2025 |
| 27 3. Rebuttal Expert Disclosure: | August 1, 2025 |
| 28 4. Dispositive Motions: | October 30, 2025 |

5. Joint Pre-Trial Order:

December 1, 2025

The parties need additional time to prepare for the disclosure of initial expert witnesses including serving of written discovery and subpoenas to make sure the parties have all relevant evidence. Additionally, the attorney handling this matter on behalf of Plaintiffs has left the firm which has caused some delay in conducting discovery. Moreover, the parties would like to reach a settlement, but additional time to conduct discovery is necessary. Accordingly, the parties are requesting a 60-day extension to the Discovery deadlines.

The instant request comports with Local Rule IA 6-1, in that no request is being made after the expiration of the specified period.

II. LOCAL RULE 26-3 IS SATISFIED

The instant request to extend discovery deadlines satisfies the requisites of Local Rule 26-3. Additionally, The parties need additional time to prepare for the disclosure of initial expert witnesses including serving of written discovery and subpoenas to make sure the parties have all relevant evidence. Additionally, the attorney handling this matter on behalf of Plaintiffs has left the firm which has caused some delay. Moreover, the parties would like to reach a settlement, but additional time to conduct discovery is necessary. Accordingly, the parties are requesting a 60-day extension to the Discovery deadlines.

The parties are requesting an additional 60-days be afforded for discovery. The following deadlines are requested.

- | | |
|--------------------------------|-------------------|
| 1. Discovery Cutoff Date: | December 1, 2025 |
| 2. Initial Expert Disclosure: | September 2, 2025 |
| 3. Rebuttal Expert Disclosure: | October 1, 2025 |
| 4. Dispositive Motions: | January 5, 2026 |
| 5. Joint Pre-Trial Order: | February 2, 2026 |

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1 The parties hereby stipulate to the proposed changes in the discovery deadlines.

2 DATED this 17th day of June 2025

3 DATED this 17th day of June 2025

4 **DIMOPOULOS LAW FIRM**

TYSON & MENDEZ LLP

5 /s/ Jared G. Christensen

/s/ Griffith Hayes

6 Jared G. Christensen, Esq.
7 Nevada State Bar No. 11538
8 *Attorneys for Plaintiffs*

Griffith Hayes, Esq.
Nevada State Bar No. 7374
Attorney for Defendant

9 **ORDER**

10 **IT IS SO ORDERED:**

11 

12 **UNITED STATES MAGISTRATE JUDGE**

13
14 Dated: June 18, 2025

15
16 The **STIPULATION AND ORDER TO EXTEND DISCOVERY (FIRST REQUEST)** in 2:25-
17
18 cv-00806-MMD-BNW was submitted by:

19
20 DIMOPOULOS LAW FIRM

21 By: /s/ Jared G. Christensen
22 Jared G. Christensen, Esq.
Nevada State Bar No. 11538
Attorneys for Plaintiffs

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From: [Griffith Hayes](#)
To: [Jared Christensen](#)
Cc: [Alexia Hernandez](#)
Subject: RE: Bernardino et al v. Nationwide General Insurance Company (211833)
Date: Wednesday, June 11, 2025 5:52:16 PM
Attachments: [image002.png](#)
 [image003.png](#)

Thanks Jared. Okay to affix my signature. Griff



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From: Jared Christensen <jach@stevedimopoulos.com>
Sent: Wednesday, June 11, 2025 3:44 PM
To: Griffith Hayes <ghayes@TysonMendes.com>
Cc: Alexia Hernandez <alh@stevedimopoulos.com>
Subject: RE: Bernardino et al v. Nationwide General Insurance Company (211833)

Thanks Griff,

Here is the proposed Stip. Please let me know if you have any revisions or let me know if we can esign for you.



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